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By ECF

March 29, 2019

Hon. Vernon Broderick
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Great Western Ins. Co. v. Mark Graham et. al.* (No. 18-cv-6249 (VSB))
Request for Further Extension of Time to Answer or Move

Your Honor:

I represent Defendant Gregory Tolaram. I write to request the Court's approval for a further extension of time for Mr. Tolaram to answer or move against the Second Amended Complaint. The original due date was March 15, 2019. On March 14th, the parties requested an extension to May 1, 2019. The Court granted an extension only until April 1st.

We are pleased to inform the Court that the parties are actively engaged in settlement discussions to resolve this matter on mutually agreeable terms. However, the General Counsel for Plaintiff Great Western is unavailable until the latter part of this week, so there is no reasonable likelihood that a settlement can be finalized by April 1, 2019.

To ensure that we will not have to ask for another extension, we respectfully request that Mr. Tolaram's time to answer or move be re-set for May 1, 2019. Gerard Kelly, lead counsel for Great Western, has agreed to and consents to this extension of time.

Respectfully submitted,

/s/ Andy S. Oh

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